

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LESLIE WILSON,	:	No. 02-CV-4662
	:	
Plaintiff	:	
	:	JURY TRIAL DEMANDED
v.	:	
	:	
	:	JUDGE BRUCE W. KAUFFMAN
PPL ELECTRIC UTILITIES	:	
CORPORATION,	:	
	:	
Defendant	:	

**MOTION FOR ENLARGEMENT
OF TIME TO FILE PLAINTIFF'S RESPONSE
TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Plaintiff Leslie Wilson, by and through his attorney, GLENNIS L. CLARK, ESQUIRE, hereby respectfully moves this Honorable court for an extension of time within which to file his response to Defendant's Motion for Summary Judgment. In support of this Motion, Plaintiff represents the following:

1. Pursuant to Order dated August 26, 2003, dispositive motions were to be completed by August 29, 2003.
2. On or about August 28, 2003 Defendant served Plaintiff with a Motion for Summary Judgment.

3. On or about August 29, 2003, Plaintiff's counsel received said Motion for Summary Judgment.

4. Counsel has been delayed in addressing the Brief because counsel's mother passed away on August 30, 2003 and he had to travel to North Carolina to make the necessary burial arrangements for Friday, September 5, 2003.

5. Counsel for plaintiff is out of the office the week of September 8, 2003 on a long scheduled vacation.

6. Counsel for Defendants has no objection to this motion, provided that the remaining dates on the Scheduling Order are also extended.

7. Plaintiff respectfully request an additional twenty (20) days, up to and including October 7, 2003, and that the remaining dates on the Scheduling Order also be enlarged by twenty (20) days.

Respectfully submitted:

Dated: _____

GLENNIS L. CLARK
I. D. No. 36682
Attorney for Plaintiff
LAW OFFICE OF GLENNIS L. CLARK
532 Walnut Street
Allentown, PA 18101
610-433-6624

CERTIFICATE OF SERVICE

I, Glennis L. Clark, Esquire, hereby certify that I have caused to be served a true and correct copy of the motion for enlargement of time to file Plaintiff's response to Defendant's Motion for Summary Judgment, via first class mail, postage prepaid on the date stated below to the offices of:

Daniel R. Halem, Esquire
Proskauer Rose, LLP
1585 Broadway
New York, NY 10036

Dated: _____

GLENNIS L. CLARK
I. D. No. 36682
Attorney for Plaintiff
LAW OFFICE OF GLENNIS L. CLARK
532 Walnut Street
Allentown, PA 18101
610-433-6624

CERTIFICATE OF CONCURRENCE

I, Glennis L. Clark, certify that I contacted Defendant's counsel, Daniel R. Halem, Esquire, and he concurs with the within Motion for Enlargement of Time.

Dated: _____

GLENNIS L. CLARK
I. D. No. 36682
Attorney for Plaintiff
LAW OFFICE OF GLENNIS L. CLARK
532 Walnut Street
Allentown, PA 18101
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